

## **Comment 1 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Michael

Last Name: Martin SR

Email Address: martinbrosandsonstrans@gmail.com

Affiliation: Martin Bros. & Sons Transportation

Subject: Clean Air Act

Comment:

In regards to this clean air act I support all you do I was borne and raised Oakland CA 1964 thank for the environmentalist and all to help keep California Clean, I just opened up my own trucking company and will continue to meet the guideline of this new act, if company's cant comply then stay out of California, thank you for keeping my state clean, if you need my support please give me a call Truly Michael R Martin Sr (owner) Martin Bros. & Sons Transportation LLC Dot # 3329651 MC # 1060824

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-10-22 18:22:13

No Duplicates.

## **Comment 2 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Thomas  
Last Name: Umenhofer  
Email Address: tom@wspa.org  
Affiliation:

Subject: WSPA Comments on Proposed CARB LCFS Regulation Amendments  
Comment:

WSPA Comment Letter, dated 11/11/2019, regarding the Proposed CARB LCFS Regulation Amendments are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/2-lcfs2019-VyBVIANyVmQGxwJh.pdf](http://www.arb.ca.gov/lists/com-attach/2-lcfs2019-VyBVIANyVmQGxwJh.pdf)

Original File Name: WSPA Comment Letter\_CARB LCFS Regulation Amendments\_11\_11\_2019.pdf

Date and Time Comment Was Submitted: 2019-11-11 17:54:36

No Duplicates.

## **Comment 3 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: PAUL

Last Name: OESTERREICH

Email Address: POESTERREICH@USABIOENERGY.COM

Affiliation: USA BIOENERGY, LLC

Subject: LCFS CREDIT PRICE CAPS

Comment:

As a renewable fuel trader and now a part of the management team at USA BIOENERGY, LLC, I want to briefly comment on the proposed hard price cap on LCFS credits. From strictly a trader's perspective the imposition of a price cap on any commodity or tradeable credit removes the freedom of the marketplace to set the price based on supply and demand, which is a key to a market that works for everyone. If the demand is higher than the supply, the market has an incentive to find ways to generate more supply. Likewise if the market is oversupplied, it sends a signal to producers and potential producers that there is greater risk in bringing more product or credits to market and these producers make adjustments in their business or plans.

From a management team perspective of a company that is working to build and operate renewable fuel production facilities, it is counterproductive to potentially limit the financial return to a project by placing an artificial cap on one of the primary revenue streams of the business, that being LCFS credits and it threatens the viability of building the facility and bringing more low-carbon fuel to the California market. This threat against the project economics can be at least somewhat mitigated if concurrently an LCFS credit price floor of say \$150/metric tonne were to be instituted, thereby ensuring that loss of upside revenue is at least somewhat mitigated by reducing the downside risk associated with lower LCFS credit values, overall providing greater revenue certainty and increasing the odds of funding the project.

CARB must acknowledge and appreciate that the only way that additional low-carbon fuel will be produced and be brought to the California market is that a reasonable degree of certainty must exist regarding LCFS credit pricing to enable these multi-million dollar projects to be financed. Without that revenue certainty, CARB's drive to lower the GHG production within the state will likely fail for lack of available low-carbon fuel due to inadequate funding to build the necessary production facilities.

Thank you for your time.

Paul Oesterreich  
VP of Fuel Strategies  
USA BioEnergy, LLC

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-12 11:11:27

No Duplicates.

## **Comment 4 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Caelin

Last Name: MacIntosh

Email Address: cmacintosh@ajw-inc.com

Affiliation: AJW, Inc.

Subject: AJW, Inc. Comments on CARB's Proposed Amendments to the LCFS

Comment:

Attached please find AJW's comments regarding CARB's proposed amendments to the LCFS.

Attachment: [www.arb.ca.gov/lists/com-attach/4-lcfs2019-BTQBPgc3VDZWYQA0.pdf](http://www.arb.ca.gov/lists/com-attach/4-lcfs2019-BTQBPgc3VDZWYQA0.pdf)

Original File Name: 191114 CCM Comment Letter - Board Hearing.pdf

Date and Time Comment Was Submitted: 2019-11-14 14:44:02

No Duplicates.

**There are no comments posted to Amendments to LCFS Regulation 2019 (lcfs2019) that were presented during the Board Hearing at this time.**